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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
WESTERN DIVISION—LOS ANGELES

9 YITZCHOK FRANKEL,) Case No. 2:24-cv-04702-MCS-
10 JOSHUA GHAYOUM,)
EDEN SHEMUELIAN, and)
11 DR. KAMRAN SHAMSA)

12)
13 Plaintiffs,)
14)

14 vs.)
15)

15 REGENTS OF THE UNIVERSITY OF) **DECLARATION OF ROE 2 IN**
16 CALIFORNIA; MICHAEL V. DRAKE,) **SUPPORT OF MOTION FOR**
President of the University of California;) **LEAVE TO INTERVENE**
17 GENE D. BLOCK, Chancellor, University)
18 of California, Los Angeles; DARNELL)
HUNT, Executive Vice-President and)
19 Provost; MICHAEL BECK,)
20 Administrative Vice Chancellor;)
21 MONROE GORDEN, JR., Vice)
Chancellor; and RICK BRAZIEL,)
22 Assistant Vice Chancellor, each in both)
his official and personal capacities,) **Judge: Hon. Mark C. Scarsi**

23)
24 Defendants.)
25)
26)
27)
28)

1
2
3 I, ROE 2, declare as follows:
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5 1. This declaration is submitted in support of Proposed Intervenor's Motion
6 for Leave to Intervene.

7 2. I am over the age of 18 and am capable of making this declaration
8 pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this
9 declaration.

10 3. I am a graduate student at UCLA. I am working toward a PhD in Art
11 History and am a fellow at the UCLA Alan D. Leve Center for Jewish Studies. I have
12 been involved in pro-Palestinian protest and activism since 2016, including at UCLA
13 since 2019. I have taken part in advocacy calling for a ceasefire and Palestinian
14 freedom since October 7, 2023.

15 4. I am Jewish and was raised in a Jewish environment. I attended Jewish
16 religious school from kindergarten through tenth grade. My bar mitzvah was in 2006.
17 Judaism remains a significant part of my life. I am a member of an anti-Zionist
18 synagogue in Chicago named Tzedek Chicago and frequently gather for Jewish ritual
19 observance with friends and family. I have also taught at a Jewish Sunday school,
20 teaching a curriculum on Jewish history as well as a social justice workshop.

21 5. I grew up in an environment that could be characterized as liberal
22 Zionist. I remember going to the March for Israel growing up, and religious leaders
23 espousing ideas like "we got Israel because of the Holocaust" and "we have to
24 support Israel because it is essential for Jewish safety." As I grew older, I learned
25 about the history of Palestine, including that over 750,000 Palestinians were
26 displaced with the founding of the State of Israel. I felt that if I were to really put into
27 practice the ideas that I was taught were central to Judaism, including always
28 standing up for the oppressed; that everyone deserves justice, equality, and dignity;

1 and that state-violence and mass killing are always bad, regardless of who is doing
2 the killing and who is being killed, then I had to support Palestinians in their struggle
3 for freedom.

4 6. I was present at the Palestine Solidarity Encampment between April 25
5 and May 1, 2024. I supported others, including Jewish students, to show up and help
6 with the encampment effort. I also served as part of the media team, conducting
7 interviews with journalists, and helped out as a safety marshal. I was present during
8 the police raid on the encampment.

9 7. I helped organize the Passover Seder that took place on April 25 and the
10 Shabbat that took place on April 26. Both were among the most moving Jewish ritual
11 observances I have been able to take part in. The Passover Seder used the story of the
12 Jewish exodus from Mitzrayim to advocate for collective liberation for all, as part of
13 the long tradition of the Passover Seder offering an opportunity to reflect on present-
14 day injustices. The Shabbat services were organized in collaboration with Muslim
15 students, who took part in evening prayer following the Shabbat service.

16 8. On Saturday, April 27, 2025 I was part of the Jewish religious ceremony
17 of Havdalah, marking the end of the Sabbath.

18 9. Jewish students and faculty helped organize the Palestine solidarity
19 encampment at UCLA. Jewish presence at the Palestine solidarity encampment was
20 also multigenerational, including the presence of families, from children to adults.

21 10. I strongly disagree with how the Palestine Solidarity Encampment is
22 characterized in the *Frankel* case. Entrance to the encampment was contingent on
23 principles, politics, and solidarity with the Palestinian struggle, and not on identity or
24 faith beliefs.

25 11. Jewish students were part of the core group of organizers of the Palestine
26 solidarity encampment, including members wearing a Kippah. Jewish students
27 formed part of the encampment's organizing leadership and media team. The
28 encampment included Jewish faculty, staff, and Jewish graduate and undergraduate

1 students who held active facilitation and leadership roles in the encampment
2 programming. These facts of Jewish organizers and Jewish religious observances
3 held within UCLA's Palestine solidarity encampment are irreconcilable with
4 plaintiffs' assertions of antisemitism.

5 12. The check points to the Palestine Solidarity Encampment were
6 established in response to continuous and escalating violence from self-proclaimed
7 Zionists and white supremacists outside the encampment.

8 13. I have been present at protest since the issuance of the Court's
9 Preliminary Injunction on August 18, 2024. I have seen how the Frankel injunction
10 has been overapplied to stifle any and all pro-Palestinian protest, with no regard for
11 whether any protected group was being prevented from accessing services, programs
12 or buildings.

13 14. I oppose genocide and the rise and normalization of fascism here and
14 abroad, including in the State of Israel under a Zionist government.

15 15. I am concerned that the conflation of anti-Zionism and antisemitism will
16 have a chilling effect on free speech and academic freedom.

17 16. I condemn the efforts to victimize and stigmatize pro-Palestinian
18 students and student associations supporting Palestinian advocacy.

19 17. I have been subject to student discipline or other processes and fear that
20 my private records will be shared with plaintiffs by UC Defendants.

21 18. FERPA rights of non-parties and parties should be respected and private
22 disciplinary records should not be shared with plaintiffs.

23 I declare under penalty of perjury under the laws of the United States that the
24 foregoing is true and correct. Executed this 2nd day of May, 2025, at Los Angeles,
25 California.

26
27 /s/Roe 2

28 Roe 2